

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MERIDA CAPITAL PARTNERS III LP,
Plaintiff,

- against -

JACOB FERNANE, PACIFIC LION LLC,
LIQUEOUS LP, “ABC CORP.” AND JOHN
DOES 1-3.

Defendants.

25 Civ. 01235 (JAV)

**DECLARATION OF RICHARD HAWKINS IN SUPPORT OF
DEFENDANTS JACOB FERNANE, PACIFIC LION LLC AND LIQUEOUS LP’S
MOTION TO COMPEL ARBITRATION OR IN THE ALTERNATIVE TRANSFER
VENUE TO THE SOUTHERN DISTRICT OF FLORIDA**

I, Richard Hawkins, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.
2. I am the Vice President, Operations & Compliance of Pacific Lion LLC.
3. I submit this Declaration in support of Jacob Fernane, Pacific Lion LLC and Liqueous LP’s Motion to Compel Arbitration or in the Alternative Transfer Venue to the United States District Court for Southern District of Florida.
4. Attached hereto as “Exhibit 1” is a true and correct copy of the subject Beneficial Ownership Retention Repurchase Option agreement dated as of June 26, 2023 by and between Plaintiff Merida Capital Partners III LP and Defendant Pacific Lion LLC.

5. Attaced hereto as “Exhibit 2” is a true and correct copy of the subject amendment to the Beneficial Ownership Retention Repurchase Option agreement dated as of June 26, 2023 by and between Plaintiff Merida Capital Partners III LP and Defendant Pacific Lion LLC.

I hereby declare under penalty of perjury this 5th day of April, 2025 that the foregoing is true and correct.



Richard Hawkins